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June 28, 2021

VIA ECF

Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Application GRANTED. SO ORDERED.

Dated: June 28, 2021

Att cl an

Re: *Torres v. Commissioner of Social Security,*
Civil Action No. 1:20-cv-07291-SDA

Dear Judge Aaron,

We write on behalf of plaintiff, Hector Torres, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is currently due on July 3, 2021. Plaintiff respectfully requests an extension of time up to and including August 16, 2021. This is plaintiff's first request for an extension.

The additional time is necessary because our office has numerous closely scheduled (and overlapping) deadlines in social security matters. For several months we received countless requests from the Agency for additional time to serve administrative records because of the delays the Agency was encountering in getting records prepared. We believe that the Agency has somewhat emerged from the backlog, but it had the unintended effect of creating a backlog on our end. For example, our office has nearly a dozen briefs due between July 1, 2021, and July 7, 2021. Given the overlapping deadlines and the fact that plaintiff's counsel, Lindsay M. Trust, will be out of the office through July 6, 2021, additional time is necessary to review the record and prepare plaintiff's brief.

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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve his motion for judgment on the pleadings on or before **August 16, 2021**;
- b. Defendant to serve its response/cross-motion on or before **October 15, 2021**; and
- c. Plaintiff to serve her reply (if any) on or before **November 5, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Heetano Shamsoonar, Esq. (by ECF)